

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF THE APPLICATION OF THE)
UNITED STATES OF AMERICA FOR AN ORDER)
AUTHORIZING THE MONITORING OF GLOBAL)
POSITIONING SYSTEM INFORMATION AND)
CELL SITE DATA FOR A SPRINT PCS CELL)
PHONE WITH THE NUMBER 202-747-8278)**

11-068-M-01
(Under Seal)

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT
FOR CELL SITE AND GLOBAL POSITIONING SYSTEM INFORMATION**

James Christie, Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), Washington Field Office ("WFO"), Washington, D.C., (hereinafter "your affiant") being duly sworn, deposes and states as follows:

INTRODUCTION

1. I am a duly appointed Special Agent of the Federal Bureau of Investigation (FBI) and have been employed as such since August, 1999. I am currently assigned to a squad which investigates Violent Crimes out of the FBI's Violent Crimes Task Force of the Washington, D.C. Field Office and I have been assigned to this squad since October, 2008. Prior to being appointed to the FBI, I served as a Philadelphia Police Officer for one year and as a Pennsylvania State Police Trooper for three years as a patrol Trooper and a criminal investigator. During the course of my participation in the investigations of violent crimes, I have testified in Grand Jury proceedings and at probable cause and detention hearings. Through my employment with the FBI, I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, consensually monitored recordings, investigative interviews, trash covers, financial investigations, the service of Administrative and Grand Jury Subpoenas, analyzing telephone pen register and caller identification system data, conducting court-authorized electronic surveillance

and the execution of search and arrest warrants. Through instruction and participation in investigations, I have become familiar with the manner in which criminal offenders conduct their illegal business and the methods, language, and terms that are used to disguise conversations about their activities.

2. This affidavit is based, in part, upon information provided to me by other agents of the FBI, information provided by a cooperating individual and an undercover employee ("UCE") physical surveillance, and other information gathered during the course of this investigation. Because this affidavit is being submitted for the limited purpose of securing an order directing telecommunications service providers to give law enforcement cell site and Global Positioning System ("GPS") information, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts which I believe are necessary to establish probable cause for the issuance of an order directing the service providers to supply cell site and GPS information.

3. As a result of my personal participation in this investigation, as well as through interviews with and analysis of reports submitted by other agents of the FBI who are involved in this investigation, I am familiar with all aspects of this investigation. On the basis of this familiarity, and on the basis of other information which I have reviewed and determined to be reliable, I allege the facts to show there is probable cause to believe the locations of **Sprint Nextel** cellular telephone number **202-747-8278** (hereinafter "the target telephone"), will provide relevant evidence to help enable the FBI to locate the user (hereinafter referred to as "Hunter"), whose residence is presently unconfirmed. If not, an encounter at his residence or other positions provided by the GPS feature may assist law enforcement in gaining identification of his criminal associates and locations where Hunter is keeping weapons and other contraband in a manner that

does not risk revealing the undercover operation. Furthermore, knowing Hunter's location at times when it is believed by law enforcement that he is meeting with potential co-conspirators and other individuals that may provide Hunter with weapons and contraband will greatly aide the FBI's primary goal of identifying Hunter's co-conspirators. The service is essential in building evidence that Hunter and his co-conspirators are in violation of Title 18, United States Code, § 2113(a), and conspiracy to commit a robbery of an armored car carrying federally insured money, in violation of Title 18, United States Code, § 371.

THE INVESTIGATION

4. This investigation was initiated by the FBI in January of 2011, based upon information received from a Cooperating Witness (hereinafter referred to as "CW-1"), who has provided truthful information on previous occasions and has never provided any false information. CW-1 provided information about an individual identified as Ricardo Hunter, who claims to have committed multiple armored car robberies recently in the Washington, D.C. metropolitan area. CW-1 independently told Hunter that CW-1 knew someone in Washington, D.C. that could help Hunter on his next armored car robbery. CW-1 then reported Hunter's interest in this proposition to the FBI.

5. On February 7, 2011, CW-1 made a recorded telephone call to Hunter. Hunter told CW-1 that he had been waiting to hear from CW-1. CW-1 told Hunter that "the dude" (UCE) was "ready to move" (i.e. plan the armored car robbery) and asked Hunter whether he wanted to call the UCE or have the UCE call Hunter. Hunter stated that it did not matter and offered to meet the UCE that very afternoon to discuss the matter. CW-1 stated that the UCE's name was "Rahim" and the UCE would call Hunter and Hunter indicated that he would be waiting for the call.

6. Later on February 7, 2011, the UCE made a recorded call to Hunter and asked if Hunter was committed to going through with the armored car robbery and Hunter stated that he

was ready and committed but did not want to discuss the matter over the phone. Hunter stated that he wanted to meet the UCE in person.

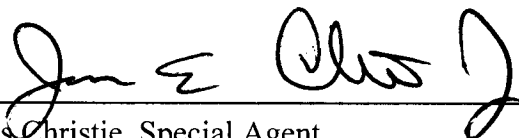
7. On February 9, 2011, the UCE and Hunter agreed to meet at the McDonald's restaurant located at 75 New York Ave., N.E., Washington, D.C. The FBI recorded this meeting in both audio and video form. During the meeting, the UCE told Hunter that he was an employee of Brinks Armored Car Services. The UCE and Hunter discussed Hunter robbing, with the UCE's "inside" assistance, the Brinks armored car that the UCE used during his route. Hunter informed the UCE that he had committed two previous armored car robberies with two other individuals and that these individuals would be available to commit another armored car robbery the coming Saturday, February 12, 2011. Hunter indicated that he had several weapons at his disposal, including an AK 47, an SK, 9 mm firearms and Glocks. Hunter also indicated that he was planning on getting a stolen vehicle to use during the armored car robbery from a "chop shop" run by an associate of his and would steal license plates to put on the vehicle. Hunter asked the UCE if they would need to put the driver of the armored car "to sleep" (i.e. kill the driver) during the robbery. Hunter indicated that he always wore latex gloves during the robberies and that he would also bring masks to conceal his face and those of the individuals working with him. During this meeting, Hunter informed the UCE that he no longer had a cellular telephone because he threw it in a river after the last armored car robbery he committed. The UCE gave Hunter the target telephone and told Hunter that he would contact Hunter on the target telephone on Saturday morning an hour before the armored car robbery would take place to provide the location.

8. Your affiant knows that when a cellular telephone is in use, signals are transmitted and received by cellular towers and the location of the cellular towers utilized by the phone is

recorded by the service providers, in this case **Sprint Nextel**. The service providers can supply this information on an ongoing basis. Knowing the location of cellular towers activated by a specific cellular telephone provides the general geographic location of the cellular telephone. Moreover, by using additional technology involving the use of the GPS, the service providers can sometimes determine the location of the cellular telephone to within a few feet. However, this GPS information can only be obtained upon a specific request for a particular time.

CONCLUSION

9. Your affiant asserts that the facts contained within this affidavit establish probable cause to believe that the location of the target telephone, with cellular service provided by **Sprint Nextel**, will provide relevant evidence to permit the FBI to facilitate the location, surveillance, and identification of Hunter and his co-conspirators while he plans and participates in the attempted robbery of an armored car, in violation of Title 18, United States Code, § 2113(a), and conspiracy to commit a robbery of an armored car carrying federally insured money, in violation of Title 18, United States Code, § 371.



James Christie, Special Agent
Federal Bureau of Investigation

FEB 10 2011

Sworn and subscribed to before me this _____ day of February, 2011.



ALAN KAY
United States Magistrate Judge